

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all  
others similarly situated,

Plaintiff,

- against -

MIZUHO BANK, LTD., THE BANK OF TOKYO-  
MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST  
AND BANKING CO., LTD., THE NORINCHUKIN  
BANK, MITSUBISHI UFJ TRUST AND BANKING  
CORPORATION, SUMITOMO MITSUI BANKING  
CORPORATION, RESONA BANK, LTD., J.P.  
MORGAN CHASE & CO., J.P. MORGAN CHASE  
BANK, NATIONAL ASSOCIATION, J.P.  
MORGAN SECURITIES PLC, MIZUHO  
CORPORATE BANK, LTD., DEUTSCHE BANK  
AG, MIZUHO TRUST AND BANKING CO., LTD.,  
THE SHOKO CHUKIN BANK, LTD., SHINKIN  
CENTRAL BANK, UBS AG, UBS SECURITIES  
JAPAN CO. LTD., THE BANK OF YOKOHAMA,  
LTD., SOCIÉTÉ GÉNÉRALE SA, THE ROYAL  
BANK OF SCOTLAND GROUP PLC, ROYAL  
BANK OF SCOTLAND PLC, RBS SECURITIES  
JAPAN LIMITED, BARCLAYS BANK PLC,  
CITIBANK, NA, CITIGROUP, INC., CITIBANK,  
JAPAN LTD., CITIGROUP GLOBAL MARKETS  
JAPAN, INC., COÖPERATIEVE CENTRALE  
RAIFFEISEN-BOERENLEENBANK B.A., HSBC  
HOLDINGS PLC, HSBC BANK PLC, ICAP PLC,  
R.P. MARTIN HOLDINGS LIMITED AND JOHN  
DOE NOS. 1-50,

Defendants.

Docket No. 12-cv-3419 (GBD)

**RULE 7.1 CORPORATE  
DISCLOSURE STATEMENT OF  
DEFENDANTS CITIBANK  
JAPAN LTD. AND CITIGROUP  
GLOBAL MARKETS JAPAN  
INC.**

ECF Case

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel of  
record for defendants Citibank Japan Ltd. and Citigroup Global Markets Japan Inc. states as  
follows:

Citibank Japan Ltd. is an indirect wholly-owned subsidiary of Citigroup Inc. Citigroup Inc., a publicly-held corporation, therefore indirectly owns 10 percent or more of the stock of Citibank Japan Ltd.

Citigroup Global Markets Japan Inc., is an indirect wholly-owned subsidiary of Citigroup Inc. Citigroup Inc., a publicly-held corporation, therefore indirectly owns 10 percent or more of the stock of Citigroup Global Markets Japan Inc.

Dated: New York, New York  
June 10, 2014

Respectfully submitted,  
  
COVINGTON & BURLING LLP

By: s/Andrew A. Ruffino  
Andrew A. Ruffino

The New York Times Building  
620 Eighth Avenue  
New York, New York 10018-1405  
(212) 841-1000  
aruffino@cov.com

*Attorney for Defendants Citibank Japan Ltd.  
and Citigroup Global Markets Japan Inc.*